

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

RENITA CHALEPAH, as
PERSONAL REPRESENTATIVE of the
ESTATE OF ZACHARY NICHOLAS
BEAR HEELS for the benefit of the Heirs
and Next of Kin and as PERSONAL
REPRESENTATIVE OF THE ESTATE
OF ZACHARY NICHOLAS
BEAR HEELS, Deceased,

v.

THE CITY OF OMAHA, a
Municipal Corporation;
SCOTTY PAYNE, in his individual
and official capacity; RYAN
MCCLARTY, in his individual and
official capacity; JENNIFER STRUDL,
in her individual and official capacity;
MAKYLA MEAD, in her individual
and official capacity; and SGT. ERIK
FOREHEAD, in his individual and
official capacity.

Defendants.

CASE NO. 8:18-cv-381

**PLAINTIFF'S INDEX OF
EVIDENCE IN SUPPORT OF
HER MOTION FOR
INDIVIDUAL SEQUESTERED
VOIR DIRE**

COMES NOW, Plaintiff, Renita Chalepah, and hereby submits her Index of Evidence in
Support of Plaintiff's Motion for Individual Sequestered Voir Dire.

Exhibit 1- 3/12/2019 Article by Peter O'Dowd and Savannah Maher

Exhibit 2- 4/23/2020 Article - Three of four OPD officers involved in Bearheels death
allowed to return to duty.

- Exhibit 3- 3/1/2019 KETV News reported by Sarah Fili
- Exhibit 4- Article "Seek Justice Department's Help Investigating Indigenous Man's Death in Omaha.
- Exhibit 5 - 4/23/22020 U.S. News - Article Panel Reinstates 3 Nebraska Officers Fired in Stun Gun Death
- Exhibit 6 - 7/26/17 - Police One.Com - Article - 2 Neb. Officers face assault charges in ECD death.
- Exhibit 7 - Nebraskans for Peace Article - Frank LaMere speaks on the Anniversary of the Death of Zachary Bear Heels.
- Exhibit 8 - 4/23/2020 - This is Money - Article- Panel reinstates 3 Nebraska Officers fired in stun gun death.
- Exhibit 9 - 3/6/2019 - Native News Online.Net - Article American Indian Activist Frank Lemere seeks Justice for Zachary Bear Heels who was killed by Police.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2020, I electronically filed the foregoing **Plaintiff's Index of Evidence** with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the attorneys of record listed below:

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